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***Proposed Liaison Counsel for the Proposed Class***

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

KALMAN ISAACS, Individually and on behalf of  
all others similarly situated,

Plaintiff,

vs.

ELON MUSK and TESLA, INC.,

Defendants.

Case No.: 3:18-cv-04865-EMC

**DECLARATION OF LAURENCE  
HASSON IN SUPPORT OF THE  
TESLA INVESTOR GROUP'S  
MOTION TO CONSOLIDATE  
RELATED ACTIONS, FOR  
APPOINTMENT AS LEAD  
PLAINTIFF AND APPROVAL OF  
COUNSEL**

**CLASS ACTION**

JUDGE: Edward M. Chen  
Hearing Date: November 15, 2018  
Time: 1:30 p.m.  
Courtroom: 5-17<sup>th</sup> Floor (San Francisco)

WILLIAM CHAMBERLAIN, Individually and on  
behalf of all others similarly situated,

Plaintiff,

vs.

TESLA INC., and ELON MUSK,

Defendants.

Case No.: 3:18-cv-04876-EMC

**CLASS ACTION**

JUDGE: Edward M. Chen

JOHN YEAGER, Individually and on behalf of all  
others similarly situated,

Plaintiff,

vs.

TESLA, INC. and ELON MUSK,

Defendants.

Case No.: 3:18-cv-04912-EMC

**CLASS ACTION**

JUDGE: Edward M. Chen

CARLOS MAIA, Individually and on behalf of all  
others similarly situated,

Plaintiff,

vs.

TESLA, INC. and ELON R. MUSK,

Defendants.

Case No.: 3:18-cv-04939-EMC

**CLASS ACTION**

JUDGE: Edward M. Chen

1 KEWAL DUA, Individually and on behalf of all  
2 others similarly situated,

3 Plaintiff,

4 vs.

5 TESLA, INC. and ELON MUSK,

6 Defendants.

Case No.: 4:18-cv-04948-HSG

**CLASS ACTION**

JUDGE: Haywood S. Gilliam, Jr.

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11 JOSHUA HORWITZ, Individually and on behalf  
12 of all others similarly situated,

13 Plaintiff,

14 vs.

15 TESLA, INC. and ELON R. MUSK,

16 Defendants.

Case No.: 3:18-CV-05258-JSW

**CLASS ACTION**

JUDGE: Jeffrey S. White

1 ANDREW E. LEFT, Individually and on behalf of  
2 all others similarly situated,

3 Plaintiff,

4 vs.

5 TESLA, INC., AND ELON R. MUSK,

6 Defendants.  
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Case No.: 3:18-CV-05463-EMC

**CLASS ACTION**

JUDGE: Edward M. Chen

11 ZHI XING FAN, Individually and on behalf of  
12 others similarly situated,

13 Plaintiff,

14 vs.

15 TESLA, INC. and ELON R. MUSK,

16 Defendants.  
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Case No.: 4:18-cv-05470-YGR

**CLASS ACTION**

JUDGE: Yvonne Gonzalez Rogers

1 I, LAURENCE HASSON, hereby declare under penalty of perjury that:

2 1. I am a partner at Bernstein Liebhard LLP. I make this Declaration in Support of Jiri  
3 Kulik, Jason Han, Esmaeil Riahi, Deepak Mehta, and Raghunath Nama (collectively, the “Tesla  
4 Investor Group”)’s Motion to Consolidate Related Actions, for Appointment as Lead Plaintiff and  
5 Approval of Counsel. The matters set forth herein are within my personal knowledge.

6 2. Attached hereto are true and correct copies of the following documents:

7 Exhibit A: The notice announcing the pendency of this action pursuant to 15 U.S.C. § 78u-  
8 4(a)(3)(A)(i);

9 Exhibit B: The Tesla Investor Group’s sworn certifications pursuant to 15 U.S.C. § 78u-  
10 4(a)(2)(A);

11 Exhibit C: The Tesla Investor Group’s Loss Chart;

12 Exhibit D: Firm Résumé of Bernstein Liebhard LLP; and

13 Exhibit E: Firm Résumé of Hedin Hall LLP.

14 Executed: October 9, 2018

/s/ Laurence Hasson  
15 LAURENCE HASSON  
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**CERTIFICATE OF SERVICE**

I, David W. Hall, hereby certify that on October 9, 2018, a true and correct copy of the annexed **DECLARATION OF LAURENCE HASSON IN SUPPORT OF THE TESLA INVESTOR GROUP'S MOTION TO CONSOLIDATE RELATED ACTIONS, FOR APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF COUNSEL** was served in accordance with the Federal Rules of Civil Procedure with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all parties with an email address of record who have appeared and consented to electronic service in this action.

Dated: October 9, 2018

/s/David W. Hall